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FEDERAL COMMUNICATIONS COMMISSION
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William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

Re: *CC Docket No. 94-54 - Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services; RM-8643 - Petition for Rulemaking of Pacific Bell Mobile Services Regarding a Plan for Sharing the Costs of Microwave Relocation*

On August 22, 1995, James Tuthill, General Counsel, Vice President, External Affairs, and Chuck Johnston, General Manager, Pacific Bell Mobile Services, and I met with Ruth Milkman, Senior Legal Advisor to Chairman Hundt; David A. Siddall, Legal Advisor to Commissioner Ness; Rosalind K. Allen, Chief, Commercial Radio Division; and William E. Kennard, General Counsel, to discuss issues outlined in Attachments A and B. Mr. Tuthill, Steve Sidore, Director of Network Engineering, and I met with Lisa B. Smith, Senior Legal Advisor to Commissioner Barrett, to discuss issues summarized in Attachment C; and with Mary P. McManus, Legal Advisor to Commissioner Ness, to discuss issues summarized in Attachments B and C. Please associate the attached material with the above-referenced proceedings.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

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William F. Caton
August 24, 1995
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Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Gina Harrison

cc: Rosalind K. Allen
William E. Kennard
Mary P. McManus
Ruth Milkman
David A. Siddall
Lisa B. Smith

Attachments (3)

BEGIN RULEMAKING ON MICROWAVE RELOCATION COST SHARING

**WE MODIFIED OUR POSITION AND SUPPORT PCIA
PROPOSAL**

WE COMPROMISED FOR INDUSTRY CONSENSUS

- **OUR PROPOSAL CONSISTS OF 1)INTERFERENCE RIGHTS, 2)ADJACENT CHANNEL COST SHARING, AND 3)A PER-LINK CAP OF \$600K.**
- **PCIA PROPOSAL CONSISTS OF 1)INTERFERENCE RIGHTS, 2)CO-CHANNEL COST SHARING, AND 3)A PER- LINK CAP OF \$250K AND \$150K IF THE TOWER HAS TO BE REPLACED.**
- **WE SUPPORT THE PCIA PROPOSAL AND RECOMMEND THE COMMISSION IMMEDIATELY OPEN A RULEMAKING.**

THERE IS BROAD SUPPORT FOR THE PCIA PROPOSAL

- AMERITECH, AMERICAN PERSONAL COMMUNICATIONS, BELLSOUTH WIRELESS, INC., OMNIPOINT COMMUNICATIONS, WESTERN PCS CORPORATION, AND WE SIGNED ONTO THE PCIA PROPOSAL.
- CTIA SUPPORTS RULES FOR MICROWAVE RELOCATION COST SHARING.
- SPRINT/WIRELESS CO., SUPPORT PCIA PROPOSAL OF \$250K PLUS ADDITIONAL \$150K IF TOWER HAS TO BE REPLACED.
- SWB SUPPORTS OPENING A RULEMAKING.
- COX SUPPORTS COMMISSION ACTION TO DEVELOP AN OBJECTIVE STANDARD OF "INTERFERENCE."
- UTAM SUPPORTS COST SHARING.

UTC GENERALLY SUPPORTS OUR PROPOSAL

- “THE PBMS PROPOSAL PROVIDES A SOLID FRAMEWORK FOR THE DEVELOPMENT OF WORKABLE COST-SHARING PROCEDURES.”
- SOME INCUMBENTS MISUNDERSTOOD OUR PROPOSAL; WE ARE NOT PROPOSING A PAYMENT CAP, ONLY A SHARING CAP.

MICROWAVE RELOCATION

WILL IT DELAY THE PCS PROMISE?

COMMISSION ACTION NEEDED

- TO FULFILL PCS PROMISE: ***RAPID DEPLOYMENT*** OF NEW SERVICES, LOWER PRICES, AND, COMPETITION FOR CELLULAR.
- TO PRESERVE POTENTIAL VALUE OF SPECTRUM IN FUTURE AUCTIONS.

NEED FOR HELP IS URGENT

- SOME INCUMBENTS BELIEVE THAT THEY ARE ENTITLED TO “GREENMAIL” TO MOVE DURING VOLUNTARY PERIOD.
- THE COMMISSION SHOULD CLARIFY OR REVISE THE RULES.
- INCUMBENTS SHOULD BE REQUIRED TO NEGOTIATE IN GOOD FAITH FOR RELOCATION TO COMPARABLE FACILITIES.



THE COMMISSION SHOULD ADOPT A ROAMING RULE

COMMISSION HELP WILL BE NECESSARY
TO ASSIST PCS'S LAUNCH

The Industry May Not Voluntarily Promote Roaming



- Large Cellular and PCS Companies Plan to Create National Networks:
 - » **AT&T/McCAW**
 - » **AIRTOUCH/BELL ATLANTIC/NYNEX/US WEST**
 - » **WIRELESS CO.**
- Customers of Regional and Small Providers May Be Unable to Access These Networks for Competitive Reasons.

A Broad Roaming Policy Should Be Adopted

- The Existing Part 22 Rule, 22.901 Should Be Extended to All CMRS Providers.
- This Would Allow Roaming on Cellular Analog Systems and Other PCS Systems.
- Additionally, the Rule Should Provide That Roaming Is Available on Fair and Nondiscriminatory Terms and Conditions.
- This Is Consistent With Sections 201 and 202.

CMRS to CMRS Interconnection Is Not Necessary.

Roaming Scenario 1 - Originating Call Only



Subscriber's Capability - Roaming subscribers are only allowed to originate calls.

Contract Arrangements:

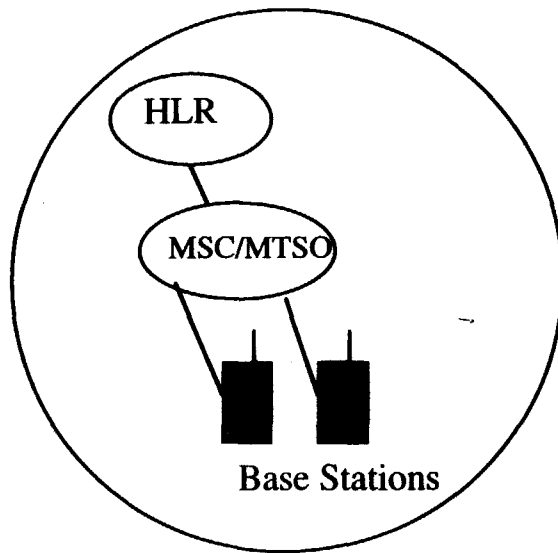
- The subscribers' home network and visited network must have agreements on the terms and conditions to compensate one another for network usage.
- The exchange of billing information becomes part of the billing settlements process.

Technology Requirements:

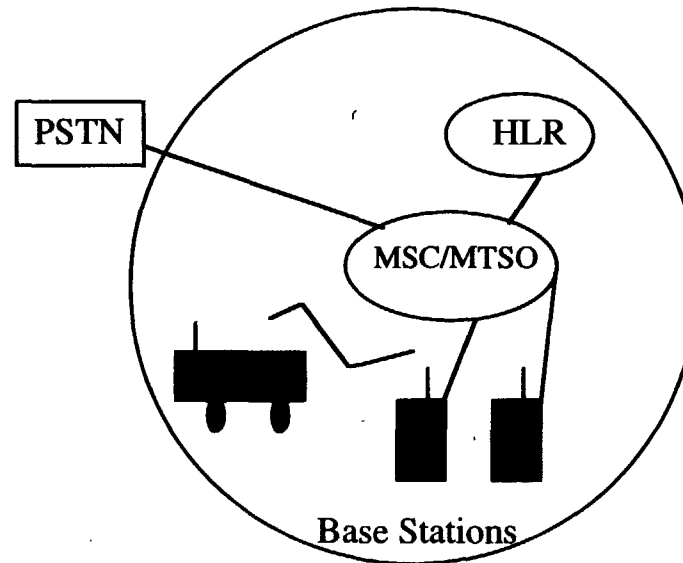
- The only technical requirement is that the subscribers' handset has an air interface compatible with the visited network.
- This may require a dual mode handset. **Dual mode handset availability (i.e. AMPS/PCS1900) is scheduled for 1Q 1996.**

Technical Requirements are no different than used by cellular today

Roaming Scenario 1 Originating Calls Only



Network A



Network B

No Core-to-Core Interconnection Required

Roaming Scenario 2 - Originating and Terminating Calls, Same Network Technology



Subscriber's Capability - Roaming subscribers can originate calls and have calls delivered to them.

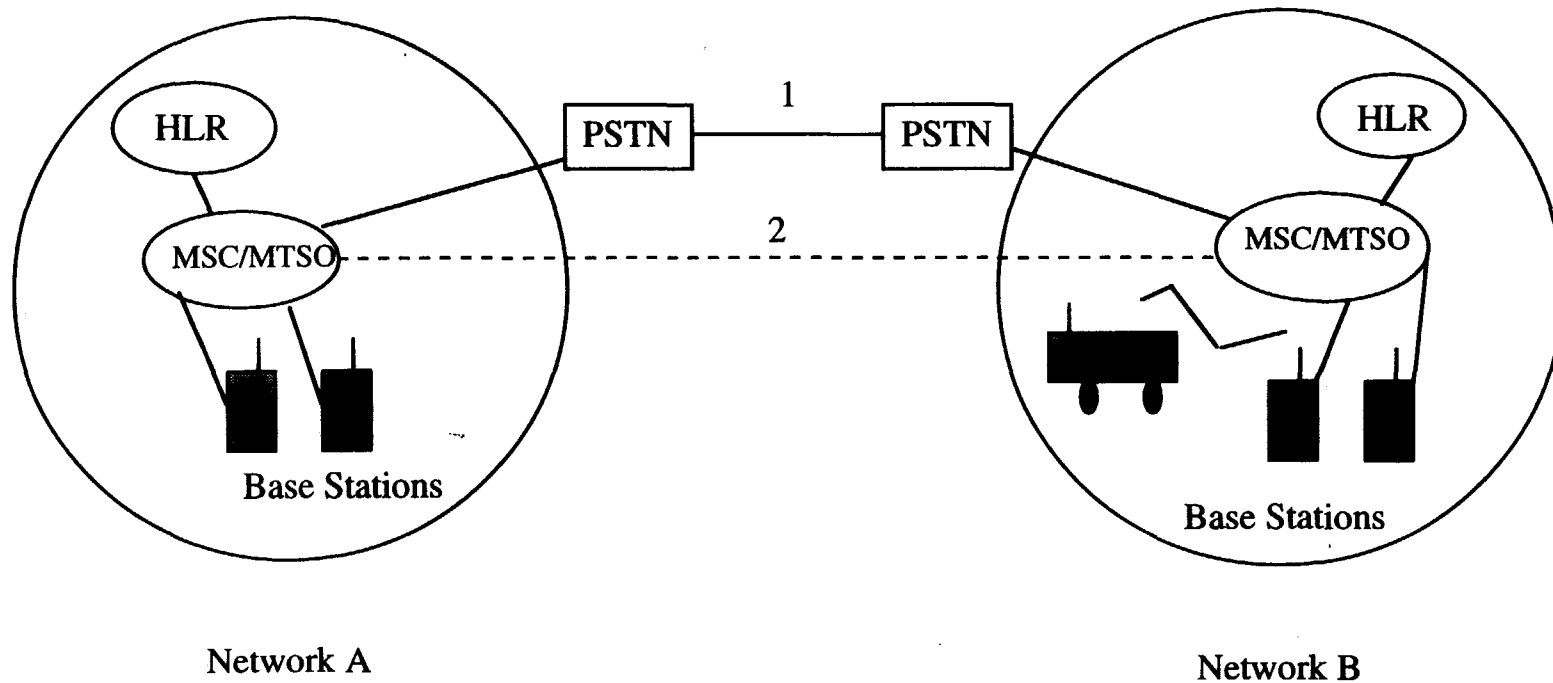
Contract Arrangements: Same as Scenario 1.

Technology Requirements:

- The subscribers' handset has the same requirements as Scenario 1.
- To enable roaming subscribers to receive calls their home network must be updated with the identification of the visited MSC/MTSO.
- Home Location Registration (HLR) for full roaming can be accomplished via several mechanisms which cellular uses today (i.e. IS-41, X.25, SS7).
- Call completion to the roaming subscriber is handled no differently than cellular today via the PSTN to the visited network.

Technical Requirements are no different than used by cellular today

Roaming Scenario 2 - Originating & Terminating Calls Same Network Technology



1. Terminating calls are delivered via the PSTN.
2. Signaling information exchange via an available national signaling network.

Roaming Scenario 3 - Originating and Terminating Calls, Different Network Technology



Subscriber's Capability - Roaming subscribers can originate calls and have calls delivered to them.

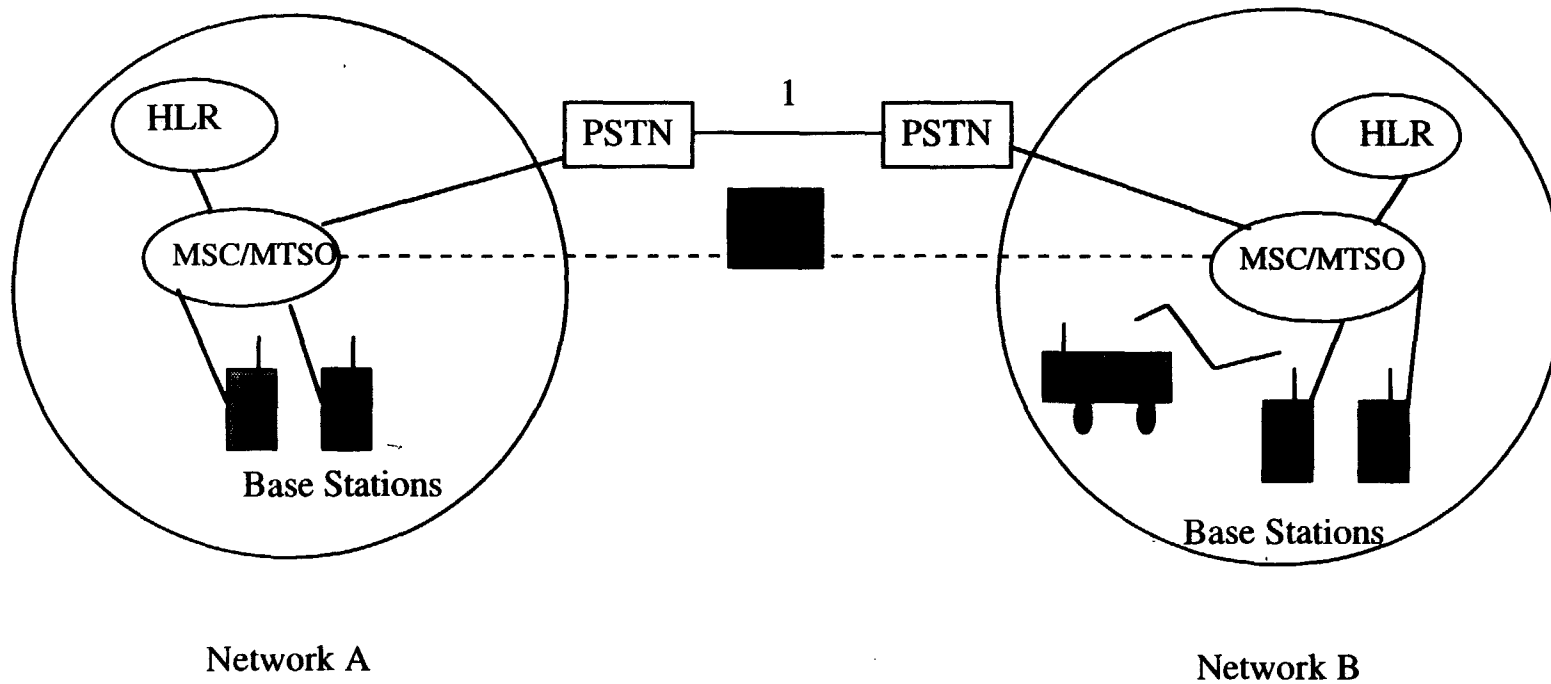
Contract Arrangements: Same as Scenario 1.

Technology Requirements:

- The subscribers' handset has the same requirements as Scenario 1.
- The subscribers' home network is updated the same way as identified in Scenario 2.
- Call completion to the roaming subscriber is the same as Scenario 2
- Protocol conversion will be needed to allow two networks with different technologies (i.e. PCS1900 and AMPS/IS41) to exchange network information messages.
- An AMPS/TDMA dual mode handset is available today.
- An AMPS/PCS1900 dual mode handset is scheduled for 1Q 1996.
- An IS-41/PCS1900 protocol converter is scheduled for 2Q 1996.

Technical Requirements are no different than used by cellular today

Roaming Scenario 3 - Originating & Terminating Calls Different Network Technology



1. Terminating calls are delivered via the PSTN.
2. Signaling information exchange via an available national signaling network with a protocol converter.

The Sequence of Events that Support Roaming



1. A Roaming Agreement is agreed upon and upgraded as needed.
2. The companies establish a billing settlements process. (A third party clearinghouse may be used such as GTE using the Cybernet system)
3. Billing procedures and processes are developed and implemented.
4. Roaming Agreement Database activated for roaming originated calls.
5. If the roaming subscriber is allowed to receive calls technical details on how the two networks will exchange registration and call delivery information must be specified. *(For example, both companies must agree on what national signaling network will be used to exchange network message information.)*

These are the same processes used by Cellular Today